

UTAH TANK NEWS

Summer
2017

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Published by the
Utah Department of
Environmental Quality

Division of Environmental
Response and Remediation

Underground Storage Tank
Branch

Alan Matheson
Executive Director

Brent H. Everett
Division Director

Therron Blatter
Branch Manager



2018 Test/Inspection Requirements

by Doug Hansen

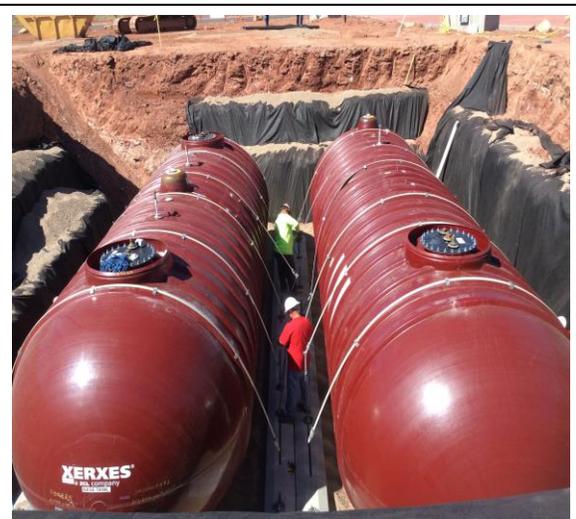
The recently enacted Utah underground storage tank rules adopted the new Federal UST regulations. Included in these changes are requirements for inspecting and testing portions of UST systems. In order to clarify the new inspection and testing requirements, EPA published the following information on their website:

www.epa.gov/ust/operating-and-maintaining-ust-systems-2015-requirements

Overfill Prevention Equipment Inspections

Beginning on October 13, 2018 owners and operators must have their overfill prevention equipment inspected for proper operation at least once every three years. Overfill prevention equipment installed after October 13, 2015 must be inspected for proper operation at installation and then once every three years. Note that most installation codes of practice require inspecting overfill prevention equipment at installation – this would qualify as the first inspection. When inspecting, owners and operators must at a minimum ensure the overfill prevention equipment is set to activate at the correct level in the tank (the level depends on the type of overfill device) and will activate when regulated substances reach that level.

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Overfill prevention equipment must be inspected according to one of the following:

- Requirements developed by the manufacturer (owners and operators may only use this option if the manufacturer has developed inspection requirements)
- A [code of practice](#) developed by a nationally recognized association or independent testing laboratory
- Requirements determined by the State of Utah to be no less protective than those developed by the manufacturer or in the code of practice

Owners and operators must maintain records of overfill prevention equipment inspections for at least three years.

Spill Prevention Equipment And Containment Sump Testing

Beginning on October 13, 2018 owners and operators must meet one of the following for spill containment equipment and for containment sumps used for piping interstitial monitoring:

Option 1: Spill prevention and containment sump equipment is double walled and the integrity of both walls is monitored at least as frequently as in the walkthrough inspection requirement (typically every 30 days for spill buckets but it may be longer if the facility receives infrequent deliveries, and annually for containment sumps). If owners and operators discontinue this periodic monitoring, they have 30 days to conduct the test described in option 2 below.

Option 2: Spill prevention equipment and containment sumps used for interstitial monitoring of piping are tested at least once every three years. The test must determine the equipment is liquid tight by using either vacuum, pressure, or liquid testing according to one of the following:

- Requirements developed by the manufacturer (owners and operators may only use this option if the manufacturer has developed testing requirements)
- A [code of practice](#) developed by a nationally recognized association or independent testing laboratory

Owners and operators must maintain records of spill prevention equipment and containment sump testing for at least three years. For spill prevention equipment and containment sumps used for interstitial monitoring of piping not tested every three years, owners and operators must maintain documentation showing the equipment is double walled and the integrity of both walls is periodically monitored for as long as the equipment is periodically monitored.

Spill prevention equipment and containment sumps used for interstitial monitoring of piping installed after October 13, 2015 must be tested for liquid tightness at installation and then once every three years. Note that most installation codes of practice require testing of this equipment for liquid tightness at installation – this would qualify as the first test.

Release Detection Equipment Testing

Beginning on October 13, 2018 owners and operators must test electronic and mechanical components of their release detection equipment for proper operation at least annually using one of the following options:

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- Manufacturer's instructions
- A [code of practice](#) developed by a nationally recognized association or independent testing laboratory

When testing, check the following:

- **Automatic tank gauge and other controllers**
 - Test the alarm
 - Verify the system configuration
 - Test the battery backup
- **Probes and sensors**
 - Inspect for residual buildup
 - Ensure any floats move freely
 - Ensure any shafts are not damaged
 - Ensure the cables are free of kinks and breaks
 - Test the alarm operability and communication with the controller
- **Automatic line leak detector**
 - Ensure the device activates (alarms, restricts flow, or shuts off flow) within an hour when simulating a release equivalent to 3 gallons per hour at 10 pounds per square inch.

What is the 50 Percent Replacement Rule for Piping?

by Sean Warner

The recent changes to the EPA UST regulations included a new definition for the term “replaced” as it pertains to UST systems (40 CFR 280.12). The new definition of replaced states: *For a tank, this means to remove a tank and install another one. For piping, it means to remove 50 percent or more of piping and then install other piping. For tanks with multiple piping runs, this definition applies independently to each piping run.*

When determining how to define what should constitute replaced piping versus repaired piping the EPA analyzed state UST regulations. They found that of states that currently require secondary containment and interstitial monitoring, 75 percent have requirements that prohibit repair of piping and require upgrading to double-walled piping whenever single-walled piping is repaired, regardless of the percentage of the piping affected. EPA further found that when about 60 percent of a piping run is repaired, the cost was equal to the cost of total replacement.

So what does the new rule mean? Essentially if a repair requires less than half of a piping run to be replaced, the same piping material may be used to complete the repair. If more than half of the piping run is affected, the entire piping run must be replaced with double-walled piping. For example, if a repair is needed on a single-walled piping run 50 feet long and 20 feet need to be replaced to complete the repair, single-walled piping may be used because piping being replaced is less than 50 percent of the piping run. If, on that same 50 foot run of single-walled piping, a repair needed to be made over a 30 foot run, the entire 50 feet would need to be replaced with double-walled piping.

For further information on this and other topics related to the 2015 Underground Storage Tank Regulations, EPA has prepared a questions and answers document that can be found at: <https://www.epa.gov/ust/questions-and-answers-about-2015-underground-storage-tank-regulation>

Leak Detection for Emergency Generators

by Bruce Hagans

The State of Utah adopted the new Federal Underground Storage Tank (UST) Regulations effective January 1, 2017. One of the provisions of these new regulations is that emergency generator (EGEN) tanks are no longer deferred from leak detection requirements. This means that by October 13, 2018 all underground emergency generator tanks are required to begin tank and product pipe leak detection. A summary of these requirements follows:

- All USTs installed **before** October 1, 2008, can use a monthly tank leak detection method described in the Federal Register, 40 CFR 280.43 (d) through (i). Any UST installed **after** October 1, 2008, must use monthly tank interstitial monitoring (IM).
- Pressurized product pipe installed on an EGEN tank **before** October 1, 2008, may use any method of piping leak detection approved for UST piping including conducting an annual pipe tightness test or performing monthly IM. Pressurized pipe installed **after** October 1, 2008, must use monthly IM. All pressurized piping must also install an automatic line leak detector and test it annually.
- Owners of EGEN tanks with safe suction piping systems should provide documentation to the DERR that there is only one check valve located directly below the day-tank and the piping slopes enough that product can drain back to the tank. Safe suction systems are exempt from testing requirements.
- Owners using U.S. suction piping systems should provide the DERR with the estimated elevation difference between the bottom of the UST and the day-tank. In addition, the location and operation of any check valves or solenoids integrated into the day tank, product piping and UST should be identified. The DERR will work with both you and your installer to ensure that the system design will meet the new requirements.

If you have any questions, contact your DERR project manager at (801) 536-4100.

Also pages 1-3 of the *Utah Tank News* provides additional information for the inspection and testing requirements for spill containment, overfill and monthly tank leak detection for all UST systems.

Important Dates to Remember

1. Certificates of Compliance are mailed at the start of December.
2. The Secondary Containment Tests to qualify for the rebate are due December 15.
3. Throughput forms are mailed out around March 15.
4. Throughput forms are due on April 30.
5. Annual tank registration and PST Fund fee invoices are mailed around May 15 and the payment deadline for these fees is June 30.
6. Any facility that has not paid the annual fees by September 1 will lose PST Fund coverage and the certificate of compliance will lapse.

What's Wrong with this Picture?

by DeAnn Rasmussen

I'm sure you can see the issue with this photo immediately! You've probably seen it a few times. Be sure and check your drop tubes after fuel is delivered. The answer is below.



ANSWER:

Sometimes the fuel delivery drivers will disable the overfill device with a stick so that they can drop fuel faster.

UTAH DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF ENVIRONMENTAL RESPONSE AND
REMEDICATION
P.O. BOX 144840
SALT LAKE CITY, UTAH 84114-4840

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Certification Corner

EXAMS for A/B Operators, UST Samplers, and UST Contractors

Testing will be conducted each month on the first Tuesday at 9:00 a.m. and the third Tuesday at 2:00 p.m. at the DEQ/DERR office located at 195 North 1950 West, Salt Lake City. All students must submit their application, supporting documentation and fees to DERR at least one week prior to taking the exam. Please contact Michelle Horning at mhorning@utah.gov to register.

CERTIFIED UST CONSULTANT ~ Initial Exam and Renewal Course Schedule

The renewal course will begin promptly at 9 a.m. and finish at 1:00 p.m. The comprehensive exam will begin at 2:00 p.m. The next date for this exam is Thursday, October 19, 2017. The UST comprehensive exam is also offered the first Tuesday of each month and the third Tuesday of each month. If you have any questions, please contact Michelle Horning at mhorning@utah.gov.